

From: [Barbara Nann](#)
To: [Rita Engblom](#)
Cc: [Garyg Miller](#)
Subject: Re: Fw: Gulfco AM
Date: 08/23/2010 02:44 PM

Can we talk about this at the weekly Gulfco meeting? It is scheduled this Thursday at 2 pm?

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▼ Rita Engblom---08/23/2010 12:25:28 PM---I've seen Gary's report, purposefully, the AM does not plan work around four year old data. Nor doe

From: Rita Engblom/R6/USEPA/US
To: Barbara Nann/R6/USEPA/US@EPA
Cc: Garyg Miller/R6/USEPA/US@EPA
Date: 08/23/2010 12:25 PM
Subject: Re: Fw: Gulfco AM

I've seen Gary's report, purposefully, the AM does not plan work around four year old data. Nor does it make an ISE determination based on the fact that "four" verses some tanks had hazardous contents in 2006. Along with things like the history of the site and the ranking, the 2006 data tells us that hazardous material was there - how many tanks is irrelevant.

The 2006 data can not be used to say that hazardous material remains in those 4 tanks/only those 4 tanks. Tanks must be re-gaged, categorized and sampled to determine haz/non-haz and disposal profile. That is what I would do and therefore, that is what I wrote.

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▼ Barbara Nann---08/20/2010 11:12:21 AM---FYI on my comments on the AM. See below. Barbara A. Nann Assistant Regional Counsel

From: Barbara Nann/R6/USEPA/US
To: Rita Engblom/R6/USEPA/US@EPA
Date: 08/20/2010 11:12 AM
Subject: Fw: Gulfco AM

FYI on my comments on the AM. See below.

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----- Forwarded by Barbara Nann/R6/USEPA/US on 08/20/2010 11:11 AM -----

From: Barbara Nann/R6/USEPA/US
To: Garyg Miller/R6/USEPA/US@EPA
Cc: Dipanjana Bhattacharya/R6/USEPA/US@EPA, Kevin Shade/R6/USEPA/US@EPA, Susan Roddy/R6/USEPA/US@EPA
Date: 08/18/2010 04:54 PM
Subject: Re: Fw: Gulfco AM

Gary,

I took a look at the AM. It still does not address the specific 4 tanks which create an imminent and substantial endangerment. The wording is very generic regarding the need to remove storage tanks. Can you give Rita your info regarding the 4 tanks and their contents to plug into the AM?

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▼ Fw: Gulfco AM

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Garyg Miller to: Barbara Nann, Dipanjana Bhattacharya, Kevin Shade, Susan Roddy

08/13/2010
04:28 PM

Any comments?

Thanks,

Gary Miller, P.E.
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----- Forwarded by Garyg Miller/R6/USEPA/US on 08/13/2010 04:28 PM -----

From: Rita Engblom/R6/USEPA/US
To: Garyg Miller/R6/USEPA/US@EPA
Date: 08/13/2010 02:41 PM
Subject: Gulfco AM

How's this?

[attachment "GulfcoTanksAM2.doc" deleted by Barbara Nann/R6/USEPA/US]

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